

**UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

SIEMENS INDUSTRY SOFTWARE, INC.,  
Plaintiffs,

v.

BELL SEMICONDUCTOR, LLC,  
Defendant.

C.A. No. 22-cv-1569-CFC

JURY TRIAL DEMANDED

**BELL SEMICONDUCTOR, LLC’S  
MOTION TO DISMISS PLAINTIFF’S COMPLAINT**

Defendant Bell Semiconductor, LLC (“Bell Semic”) respectfully moves this Court to dismiss Plaintiff Siemens Industry Software, Inc.’s (“Plaintiff”) Complaint for Declaratory Judgment. (D.I. 1). The Court has no subject matter jurisdiction to entertain this suit. *See* U.S. CONST. art. III § 2. And even if that were not so, “well-founded reasons” would counsel dismissing Plaintiff’s Complaint nonetheless. *See Mitek Sys., Inc. v. United Servs. Auto. Ass’n*, 34 F.4th 1334, 1347 (Fed. Cir. 2022) (citation omitted). Under D. Del. LR 7.1.2(a), the complete grounds for this Motion are set forth in the accompanying Opening Brief in support of Bell Semic’s Motion to Dismiss Plaintiff’s Complaint.

Dated: January 26, 2023.

Respectfully submitted,

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